

ACLU OF HAWAII FOUNDATION

Mateo Caballero #10081
Jongwook "Wookie" Kim #11020
P.O. Box 3410
Honolulu, Hawaii 96801
Telephone: (808) 522-5908
Facsimile: (808) 522-5909
E-mail: mcaballero@acluhawaii.org
wkim@acluhawaii.org

Case No. 1:18-cv-00477-LEK-RT

[CIVIL RIGHTS ACTION]
[CLASS ACTION]

LEGAL AID AT WORK

Elizabeth Kristen, *pro hac vice*
J. Cacilia Kim, *pro hac vice*
Kim Turner, *pro hac vice*
180 Montgomery Street, Suite 600
San Francisco, CA 94104
Telephone: (415) 864-8848
Facsimile: (415) 593-0096
E-mail: ekristen@legalaidatwork.org
ckim@legalaidatwork.org
kturner@legalaidatwork.org

SIMPSON THACHER & BARTLETT LLP

Jayma M. Meyer, *pro hac vice*
425 Lexington Avenue
New York, NY 10017
Telephone: (212) 455-3935
Facsimile: (212) 455-2502
E-mail: jmeyer@stblaw.com

Harrison J. Frahn IV, *pro hac vice*
Wyatt A. Honse, *pro hac vice*
2475 Hanover Street
Palo Alto, California 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
E-mail: hfrahn@stblaw.com
wyatt.honse@stblaw.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

A.B. and A.M.B., by their parents and next friends, C.B. and D.B., and T.T., by her parents and next friends, K.T. and S.T.,

Plaintiffs,

vs.

HAWAII STATE DEPARTMENT OF EDUCATION and OAHU INTERSCHOLASTIC ASSOCIATION,

Defendants.

Case No. 1:18-cv-00477-LEK-RT

[CIVIL RIGHTS ACTION]

PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT; MEMORANDUM IN SUPPORT OF MOTION; EXHIBIT 1 (PROPOSED SECOND AMENDED COMPLAINT); EXHIBIT 2 (REDLINED PROPOSED SECOND AMENDED COMPLAINT); CERTIFICATE OF SERVICE

[CLASS ACTION]

PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiffs A.B. and A.M.B., by their parents and next friends, C.B. and D.B., and T.T., by her parents and next friends, K.T. and S.T., by and through their counsel (together, "Plaintiffs"), hereby move this Court for leave to file a Second Amended Complaint in the above-captioned lawsuit. Plaintiffs seek to amend their Title IX civil rights Complaint to add one additional plaintiff and putative class representative, A.P.

Counsel for Plaintiffs asked counsel for Defendants to stipulate to the filing of the Second Amended Complaint, but counsel for Defendants would not agree.

This Motion is brought pursuant to Rules 7 and 15(a)(2) of the Federal Rules of Civil Procedure and Rule 7.2 of the Local Rules for the U.S. District Court for the District of Hawaii. This Motion is supported by the attached Memorandum, the attached exhibits, the records and files in this case, and any additional matters that may be presented at or before hearing.

DATED: Honolulu, Hawaii, August 21, 2019.

Respectfully submitted,

/s/ Jongwook “Wookie” Kim
Mateo Caballero
Jongwook “Wookie” Kim
ACLU OF HAWAII FOUNDATION

Elizabeth Kristen
J. Cacilia Kim
Kim Turner
LEGAL AID AT WORK

Harrison J. Frahn, IV
Jayma M. Meyer
Wyatt A. Honse
SIMPSON THACHER & BARTLETT LLP

Attorneys for Plaintiffs